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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

UNITED STATES OF AMERICA,)	2:15-CR-245-JCM-NJK
)	
)	
Plaintiff,)	
)	
v.)	
)	
JORGE MONTESINOS-CAMPOS,)	
)	
Defendant.)	
_____)	

STIPULATION FOR EXTENSION OF TIME

IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden, United States Attorney, and Phillip N. Smith, Jr., Assistant United States Attorney, counsel for the United States of America, and Paul D. Riddle, Assistant Federal Public Defender, counsel for Defendant JORGE MONTESINOS-CAMPOS, that the date for the Government to file a response to the Defendant's Motion to Suppress (Docket #27) be extended until March 14, 2016.

This stipulation is entered for the following reasons:

1. On February 3, 2016, the Defendant filed a Motion to Suppress. *See* Docket #27. The Government's response deadline is March 2, 2016.
2. The Government has extended an offer to resolve this case, which would obviate the need for the Government to respond to the Defendant's Motion. Counsel for the Defendant needs time to present the offer to the Defendant.

1 3. The Defendant is incarcerated, but he does not object to the continuance of the
2 Government's response deadline.

3 4. The additional time requested herein is not sought for purposes of delay, but
4 merely to allow the parties an opportunity to resolve this case, which would obviate the need for
5 further litigation.

6 5. Additionally, denial of this request for continuance could result in a miscarriage
7 of justice.

8 6. This is the second stipulation filed herein to continue the Government's response
9 deadline.

10 DATED: March 2, 2016.

11
12 _____/s/_____
13 PHILLIP N. SMITH, JR.
14 Assistant United States Attorney
15 Counsel for the United States

11
12 _____/s/_____
13 PAUL D. RIDDLE.
14 Assistant Federal Public Defender
15 Counsel for Defendant JORGE MONTESINOS

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

UNITED STATES OF AMERICA,)	2:15-CR-245-JCM-NJK
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Plaintiff,)	
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v.)	
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JORGE MONTESINOS-CAMPOS,)	
)	
Defendant.)	
_____)	

FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. On February 3, 2016, the Defendant filed a Motion to Suppress. *See* Docket #27. The Government's response deadline is March 2, 2016.

2. The Government has extended an offer to resolve this case, which would obviate the need for the Government to respond to the Defendant's Motion. Counsel for the Defendant needs time to present the offer to the Defendant.

3. The Defendant is incarcerated, but he does not object to the continuance of the Government's response deadline.

4. The additional time requested herein is not sought for purposes of delay, but merely to allow the parties an opportunity to resolve this case, which would obviate the need for further litigation.

5. Additionally, denial of this request for continuance could result in a miscarriage of justice.

